

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**[1] CHESTER GALLAGHER  
[2] HEATHER IDONI  
[3] CALVIN ZASTROW  
[4] COLEMAN BOYD  
[6] PAUL VAUGHN  
[7] DENNIS GREEN**

**No. 3:22-CR-00327-1  
JUDGE TRAUGER**

**UNOPPOSED MOTION REQUESTING PERMISSION TO FILE ADDITIONAL *IN*  
*LIMINE* MOTIONS WARRANTED BY ADDITIONAL GOVERNMENT  
DISCLOSURES IF NECESSARY**

Comes now the Defendants, Chester Gallagher, Heather Idoni, Calvin Zastrow, COLEMAN BOYD, PAUL VAUGHN and DENNIS GREEN, by and through undersigned counsel, and hereby requests permission to file additional *in limine* motions should additional unanticipated issues arise following the Government's further disclosures of discovery and Jencks materials which defense counsel anticipate prior to trial.

In support of this motion, the Defendants submit as follows:

Pursuant to this Court's scheduling order, the Defendants' *in limine* motions are due December 4, 2023 (DE 298). In anticipation of the *in limine* deadline, defense counsel and the Government have conferred about various issues. The parties have reached agreement on some issues and will file *in limine* motions addressing issues that remain in dispute by the December 4<sup>th</sup>, 2023, deadline. While discussing these issues, the Government indicated that it intends to

provide additional materials to the defense as the trial date nears. Upon receipt of those materials, additional *in limine* issues may be necessary and appropriate.

Defense counsel consulted with the Government and they do not oppose this motion. As the Defendants do not currently have all of the materials that the Government intends to disclose, the Defendants request leave of this Court to file additional *in limine* motions regarding issues that may arise from the additional discovery materials the Government anticipates disclosing to the defense. Similarly, should the defense provide the Government with Defense Discovery that warrants the need for the Government to file any additional motions *in limine*, the Defendants do not oppose the Government filing *in limine* motions or other pleadings to address any issues that arise. The parties have been conferring about *in limine* motions and other issues in an attempt to work matters out prior to filing motions and in an effort to streamline the trial as much as possible.

Based upon the foregoing, the parties request that the Court grant the instant motion and allow the parties to file additional motions in limine, if issues are raised by future discovery and other disclosures.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing Motion was filed electronically and served on the following by the EF/CME electronic filing system:

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This the 4<sup>th</sup> day of December 2023.

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